

Mr. Gary K. Van Meter Director Office of Regulatory Policy Farm Credit Administration 1591 Farm Credit Drive McLean, VA 22102-5090

Re: Standards of Conduct Proposed Rule

Dear Mr. Van Meter:

We are writing to request that the Farm Credit Administration extend for 60 days the public comment period for the proposed rule relating to Standards of Conduct for Farm Credit institutions.

We have been working to understand the rule, and all of the implications of the changes that are proposed in the rule. This process requires communication with our Board of Directors, and also with our funding bank, CoBank. The rule includes proposed changes that have potentially significant impacts to our business including the relationships with our shareholders, and our directors. We wish to be careful in our review, and believe additional time is necessary for us to understand all of the rule's implications.

We appreciate your consideration of our request, and look forward to being participative in this important process as it moves forward.

Sincerely,

Keith Hesterberg President & CEO

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